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18 HAMAMATSU CORPORATION,

HAMAMATSU PHOTONICS K.K., and

19 PHOTONICS MANAGEMENT CORP.

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 SEMICAPS PTE LTD.,

23 Plaintiff,

24 vs.

25 HAMAMATSU CORPORATION, et al.,

26 Defendants.

CASE NO. 17-cv-03440-DMR

**DEFENDANTS' UNOPPOSED MOTION  
FOR ISSUANCE OF LETTER OF  
REQUEST FOR INTERNATIONAL  
JUDICIAL ASSISTANCE TO DEPOSE  
AND REQUEST DOCUMENTS FROM  
IPFA**

Date: Thursday, May 28, 2020

Time: 1:00 p.m.

Courtroom: 4

Judge: Honorable Donna M. Ryu

**NOTICE OF MOTION AND MOTION**

TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on Thursday, May 28, 2020, at 1:00 p.m., or such other time as ordered by the Court, located at 1301 Clay Street, Oakland, CA 94612, Defendants Hamamatsu Corporation, Hamamatsu Photonics K.K., and Photonics Management Corp. (collectively, “Hamamatsu”) will respectfully move to request that this Court sign and issue the attached Letter of Request for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters (“Letter of Request”), attached hereto as Exhibit 1, in order to request the deposition and documents of the International Symposium on the Physical and Failure Analysis of Integrated Circuits (“IPFA”).

The IPFA hosted the 13<sup>th</sup> International Symposium on the Physical and Failure Analysis of Integrated Circuits on July 3-7, 2006 in Singapore. The article, *DC-Coupled Laser Induced Detection System for Fault Localization in Microelectronic Failure Analysis* by Quah et al., was published during the IPFA conference proceedings. The IPFA therefore possesses information that is highly relevant to this lawsuit. The IPFA is located in Singapore and under the jurisdiction of the Singapore courts, including the Supreme Court of Singapore. The evidence requested cannot be obtained without the aid of the Supreme Court of Singapore. Hamamatsu respectfully requests that the Court execute the attached Letter of Request at its earliest convenience.

Plaintiff SEMICAPS Pte Ltd. (“SEMICAPS”) has confirmed that it does not oppose this request for issuance of a Letter of Request for International Judicial Assistance.

Dated: April 15, 2020

QUINN EMANUEL URQUHART & SULLIVAN,  
LLP

By: /s/ David Eiseman  
David Eiseman

Attorneys for Defendants  
HAMAMATSU CORPORATION,  
HAMAMATSU PHOTONICS K.K., and  
PHOTONICS MANAGEMENT CORP.

**CERTIFICATE OF SERVICE**

I, Joseph LeRoy, certify that pursuant to Local Rule 5-5, counsel of record who have consented to electronic service are being served on April 15, 2020 with copies of the attached document(s) via the Court's CM/ECF system, which will send notification of such filing to counsel of record.

Executed on April 15, 2020, at San Francisco, California.

/s/ Joseph LeRoy